U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Plate-Rite Plating Site - Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #3**
December 2010 Update
Plate-Rite Plating Site
B5YL
Dayton, OH
Latitude: 39.8476384 Longitude: -84.2173403

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From: Steven Renninger, On-Scene Coordinator
Date: 12/23/2010
Reporting Period: November 20 through December 23, 2010

1. Introduction

1.1 Background

Site Number:	B5YL	**Contract Number:**	EP-S5-08-02
D.O. Number:	EP-G105-00064	**Action Memo Date:**	9/23/2010
Response Authority:	CERCLA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	10/18/2010	**Start Date:**	10/18/2010
Demob Date:		**Completion Date:**	
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	Ohio EPA notified
FPN#:		**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action

1.1.2 Site Description

The Plate-Rite (PR) Plating Site includes one 13,000-square-foot building in Dayton, Ohio. The Site is located i
mixed residential, commercial, and industrial area. The Site is bordered to the north by a residential property, t

the south by a commercial building, to the east by a residential property and Webster Street, and to the west by wooded area. The Site is located within 200 feet of residential areas and within 500 feet of commercial businesses. The Site is also located approximately 1.5 miles north of the Great Miami River.

The on-site building containers numerous plating tanks, pits, 55-gallon drums, containers and laboratory chemi containing hazardous wastes.

1.1.2.1 Location

The PR Plating Site is located at 5311 Webster Street in Dayton, Montgomery County, Ohio. The Site's geographical coordinates are 39° 49' 2.28" North latitude and 84° 10' 51.996" West longitude.

1.1.2.2 Description of Threat

Electroplating operations began at the PR Plating Site in 1985 and ceased in 2007. Bohn-Jur, Co., is the curre Site owner.

In February 1985, the Plate-Rite Co., Inc., began plating operations at the Site and provided product to vari industries such as the medical, food service, appliance, automotive, and tool room industries. The comp electroplated a host of surfaces, including aluminum, cast iron, carbon steel, stainless steel, brass, copper, zinc castings. The company also worked with plating finishes that included copper, multi-layer nickel, zincat decorative chrome, polished nickel chrome, nickel plate satin finish. On August 3, 2005, the company volunt dissolved.

In December 2005, Master Vision Plating, LLC (MV), was formed. MV leased the Site from the Bohn-Jur, Co., conducted electroplating operations until 20

On June 1, 2010, the Harrison Township Fire Department (HTFD) conducted a fire safety inspection at the on- building. The HTFD found numerous fire code violations and also observed the following:

- 21 plating tanks (approximately 1,000 gallons each) with liquids and solids;
- Three underground storage pits;
- 150 to 200 containers, most containing cyanides, acids, nickel, copper, and alkalines;
- One pallet of flammable material (paints);
- A laboratory with numerous small containers of chemicals;
- Spillage between tanks in the dip tank room; and
- Leaking 55-gallon drums.
-

The HTFD stated that since 2007, local authorities have had to respond to reports of breaking and entering of Site on eight different occasions. The most recent break-in occurred the weekend of July 17, 2(

On June 18, 2010, the HTFD submitted a letter to U.S. EPA requesting assistance in conducting a time-cri removal action at the S

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating S

On August 17, 2010, the Ohio Environmental Protection Agency (OEPA) requested assistance from the U.S. E in conducting a potential time-critical removal action involving numerous abandoned plating tanks, drums, containers of plating waste at the S

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Resu

On July 22, 2010, U.S. EPA conducted a site assessment at the PR Plating Site and observed documented the presence of approximately 21 plating tanks, three underground storage pits, a laborat and approximately 200 55-gallon drums and small containers of liquid and solid wastes loca throughout the on-site building. U.S. EPA collected 15 investigative liquid waste and 4 investiga solid waste samples from plating tanks, 55-gallon drums, containers, and the floor of the building. Ba on analytical results for the samples collected during the site assessment, the drums and contain contain corrosive, caustic, and flammable liquids, and the plating tanks and drums contain TCLP arse (D004), TCLP cadmium (D006), TCLP chromium (D007), TCLP lead (D008), and cyanide-bearing to wastes.

Hazardous wastes identified at the Site exhibited the following characterist

- Ignitabil
- Corrosiv
- Reactivity;
- Toxic

Based on the analytical results and Site conditions observed during the site assessment, the Site meets criteria for a removal action pursuant to 40 CFR 300.415(b)(2).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On September 9, 2010, the Emergency Contingency Plan was finalized by U.S. EPA and distributed to the HTFD.

On September 23, 2010, the Action Memorandum was signed by the Director of the U.S. EPA Region Superfund Division approving the removal action at the PR Plating Site.

On September 30, 2010, a delivery order was issued to the ERRS contractor (EQM) to conduct remov activities at the site.

On October 25, 2010, U.S. EPA initiated removal activities at the site.

Between October 27 - November 19, 2010, the following site activities were completed: Site security, air monitoring, sampling and haz catting of wastestreams, bulking of wastes, initiation of off-site disposal. See POLREP 2 for further detail of November 2010 activities.

2.1.2 Response Actions to Date

Week of November 29, 2010
On December 2, 2010, the following waste was transported for off-site disposal:

- 1,800 gallons of acid (hydrochloric and sulfuric acid) liquid was transported for off-site dispos to Vickery Environmental, Inc., located in Vickery, Ohio;
- 3,900 gallons of chromic acid liquid was transported for off-site disposal to Vickery Environmental, Inc., located in Vickery, Ohio;
- 4,300 gallons of hazardous waste liquid (chromium) was transported for off-site disposal to Vickery Environmental, Inc., located in Vickery, Ohio; and
- one 20-cubic yard rolloff box of hazardous debris was shipped for off-site disposal to Heritage Environmental Services, Indianapolis, Indiana.

ERRS continued dismantling the plating process area, sizing hazardous debris into the rolloff boxes ar decontaminating the Baker storage tanks used to store the acid, chromic acid and hazardous liquid wa which was pumped on December 2nd.

START conducted continuous air monitoring using an AreaRAE network within the facility building. The AreaRAEs contain a hydrogen cyanide sensor. Off-shift site security continued.

Week of December 6, 2010
On December 9, 2010, the following waste was transported for off-site disposal:

- 1,700 gallons of caustic (high pH) liquid was transported for off-site disposal to Vickery Environmental, Inc., located in Vickery, Ohio;
- 850 gallons of chromic acid liquid was transported for off-site disposal to Vickery
- one 20-cubic yard rolloff box of hazardous debris was shipped for off-site disposal to Heritage Environmental Services, Indianapolis, Indiana; and
- one 55-gallon drum of flammable liquid was shipped for off-site disposal to Clean Water Dayt located in Dayton, Ohio.

ERRS continued dismantling the plating process area, sizing hazardous debris and preparing the empt Baker storage tanks for demobilization.

ERRS initiated bulking the dry caustic solids into 55-gallon drums for disposal.

START conducted continuous air monitoring using an AreaRAE network within the facility building. The AreaRAEs contain a hydrogen cyanide sensor. Off-shift site security continued.

Week of December 13, 2010
On December 13, 2010, two non-hazardous debris rolloff boxes were shipped for offsite disposal to Stony Hollow Landfill, Dayton, Ohio.

ERRS completed bulking the dry caustic solids into eleven 55-gallon drums.

ERRS completed bulking the cyanide liquid into two 500-gallon poly totes in preparation for off-site disposal.

ERRS completed bulking the cyanide solids (remnant solids in drums and vats that once contained cyanide liquid) into three 55-gallon drums.

On December 16, 2010, ERRS arranged the transportation of eleven 55-gallon drums of dry caustic solids, two 55-gallon totes of cyanide liquid and three 55-gallon drums of cyanide solids to Petro-Chei Processing Group, Detroit, MI for off-site disposal.

ERRS continued dismantling the plating process area, sizing hazardous debris and cutting up vats with sawzaws, circular saws. The plating vat cutting is being conducted in Level B PPE per the site safety plan.

ERRS initiated consolidation of the hazardous waste solid contents remaining in the bottom of the plating vats (chromium waste).

START conducted continuous air monitoring using an AreaRAE network within the facility building. The AreaRAEs contain a hydrogen cyanide sensor. Off-shift site security continued.

Week of December 20, 2010
ERRS continued dismantling the plating process area, sizing hazardous debris and cutting up vats with sawzaws, circular saws. The vat cutting is being conducted in Level B PPE.

ERRS arranged for the transportation of two 20-cubic-yard rolloff boxes containing hazardous debris : off-site disposal to Heritage Environmental, located in Indianapolis, Indiana. Air monitoring and off-shift site security continued.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

U.S. EPA has identified various PRPs for this Site, but none of the identified PRPs were capable to fu the removal action.

2.1.4 Progress Metrics

Waste Stream	*Medium*	*Quantity*	*Manifest #*	*Treatment*	*Disposal*
Acid Liquid	Liquid	1,800 gallons	002775514FLE	Treatment	Vickery Environmental, Inc. Vickery, OH
Caustic Liquid	Liquid	1,700 gallons	002775591FLE	Treatment	Vickery Environmental, Inc. Vickery, OH
Chromic Acid	Liquid	4,750 gallons	002775512FLE	Treatment	Vickery

Liquid			002775597FLE		Environmental, Inc. Vickery, OH
Hazardous Liquid (chromium))	Liquid	4,300 gallons	002775515FLE	Treatment	Vickery Environmental, Inc. Vickery, OH
Caustic Solids (dry)	Solid	11 drums	007743987JJK	Treatment	Petro-Chem Processing Detroit, MI
Cyanide Liquid	Liquid	2 totes	007743986JJK	Treatment	Petro-Chem Processing Detroit, MI
Cyanide Solids (sludge)	Sludge	3 drums	007743986JJK	Treatment	Petro-Chem Processing Detroit, MI
Hazardous Debris	Solid	3 rolloff boxes (60 total cubic yards)	Various	Landfill	Heritage Indianapolis, IN
Flammable Liquid	Liquid	1 drum	004716086JJLK	Fuels Blending	Clean Water Dayton Dayton, OH
Non-haz debris	Solid	2 rolloff boxes	Various	Landfill	Stony Hollow Landfill Dayton, OH

2.2 Planning Section

2.2.1 Anticipated Activities

U.S. EPA will conduct the following activities:

1. Develop and implement a site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Inventory and perform hazard characterization on all substances contained in containers, drums, vats, and tanks;

4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposa
5. Dismantle and decontaminate process equipment, vats, tanks and building components associated with the plating are as necessary; and
6. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).

2.2.1.1 Planned Response Activities

See Section 2.2.1.2.

2.2.1.2 Next Steps

No on-site work scheduled from December 24, 2010 through January 2, 2011. Site security will rema on-site during this time frame. The next steps will continue starting on January 3, 2011:

1. Continue general cleanup activities.
2. Continue dismantling the plating process line.
3. Continue cutting up plating vats and tanks.
4. Load and dispose off-site the hazardous waste solids in the plating line pit.
5. Arrange for the disposal of the two small PCB transformers.
6. Decontaminate building flooring and pit area.
7. Seal the concrete flooring in the plating room.
8. Continue air monitoring during removal activities.
9. Continue off-shift security.

2.2.2 Issues

1) Site hours are Monday through Friday, 0700 to 1800 hours (resuming on January 3, 2011).
2) Site Security is being conducted during non-working hours.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remainir
Extramural Costs				
ERRS - Cleanup Contractor	$350,000.00	$272,980.00	$77,020.00	22.01
TAT/START	$44,000.00	$30,000.00	$14,000.00	31.82
Intramural Costs				

USEPA - Direct	$36,000.00	$15,500.00	$20,500.00	56.94
Total Site Costs	$430,000.00	$318,480.00	$111,520.00	25.93

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. cost accounting provided in this report does not necessarily represent an exact monetary figure which government may include in any claim for cost recovery.

2.5 Safety Officer

On October 21, 2010, the Site H&S Plan was finalized.

On October 25, 2010, all site personnel read and signed the approved H&S Plan.

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

3.2 Cooperating and Assisting Agencies

Harrison Township Fire Department - Mark Lynch

Ohio EPA DERR - Dave Combs, Jim Crawford

4. Personnel On Site

U.S. EPA -- 1 OSC
START -- 1 WESTON START
ERRS -- 3 EQM and 3 Inland Waters of Ohio

5. Definition of Terms

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information such as a copy of "U.S. EPA's Site Assessment Report" or the "Emergency

Contingency Plan", please refer to the "Documents" Section of the project website http://www.epaosc.org/.

6.2 Reporting Schedule

The next POLREP will be issued in January 2011.

7. Situational Reference Materials